January 22, 1999

Ms Maryann Anderson
U.S. Department of Energy
Rocky Flats Field Office Bldg. 460, P.O. Box 928
Golden, Colorado 80402-0928

Dear Ms. Anderson:

Thank you for the opportunity to review and provide comments by the City of Westminster on the Proposed Action Memorandum for the East Trenches Plumes. Alternative 3 is supported with the following considerations, concerns and requests for further information noted:

- Page 3 of the PAM indicates that the proposed action for the East Trench plumes has the objective "to protect surface water and reduce the VOC contaminant mass loading in surface water to the extent practicable."The PAM indicates that VOC contamination has reached South Walnut Creek. Please provide the city with additional information as to what parameters will be used to determine what is a practicable reduction; and what percentage of contaminant removal is anticipated by the passive reactive metal treatment that is being proposed

- Information presented by Rocky Mountain Remediation Services at the January 18, 1999 Citizens Advisory Board meeting indicated that the treatment system planned would not contain all the VOC's from the Trench Plume. Please provide information as to the percentage of VOC's that could be expected to reach Walnut Creek with the new system in place

- Page 15, paragraph 2 notes that the East Trenches groundwater contaminant plume is not currently causing exceedences at the points of compliance but that this cannot be assured after site closure. Also noted is the fact that the Valley Fill Alluvium is a preferential pathway for contaminated groundwater to move towards the Site boundary. The City of Westminster is concerned about the potential for future migrations of contamination into Walnut Creek, which flows through the City to the Big Dry Creek drainage. It is recommended that the site work with the City of Westminster to determine a long-term protection strategy for surface water leaving the site and flowing into Walnut Creek.

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At the site there are five Solar Evaporation Ponds, used from 1953 to 1986 to store and evaporate process wastes and other liquids. Removal of pond sludge was completed in 1995. However, there is a plume of nitrate and uranium-contaminated groundwater, which extends north and east from the solar ponds to the North Walnut Creek drainage. Water from the Solar Ponds Plume currently is collected and evaporated; this system is scheduled for D&D prior to site closure and has high maintenance and overhead costs. Data indicates that higher concentrations of nitrate are likely in the future, and are moving toward North Walnut Creek. A remedial action now can prevent higher concentrations from reaching the stream. The proposed system is similar to that for the East Trenches Plume – building an 850 foot long collection system, with passive flow-through treatment cells, containing reactive iron to reduce nitrates and remove uranium. The project is expected to cost approximately $2.2 million. The public comment period begins in February.

Board members provided comments on these proposed projects, summarized below:

- It is better to use maximum flow rates rather than average flow rates.
- Develop a cost/benefit analysis that factors in any stewardship costs and maintenance of the systems in the future.
- Influent and effluent waters should be monitored closely to ensure radionuclides are adequately removed by this treatment system.
- There was a determination that the East Trenches Plume has a much lower groundwater flow rate than the Solar Ponds. Due to the proximity of these areas, shouldn't the flows be more similar?
- Will the treatment systems be able to handle higher flow rates as a result of flooding and wet seasons?
- Concerns about possible seepage of the Solar Ponds Plume via surface discharge, what are the contingencies for mitigating seep impacts to water quality?
- CAB requested the following information:
  - ✓ results from the bench scale tests from both plumes;
  - ✓ performance data from the Mound Plume project;
  - ✓ a copy of the plume maps; and
  - ✓ specifics about the mechanisms and chemistry that allows the iron filings to remove uranium.

Presentation and Discussion / Comment – Radioactive Waste Storage Proposal. Kenneth Werth, who is a citizen of Arvada, was given an opportunity to present at the Board meeting his concept for a storage facility at the Rocky Flats site. Mr. Werth proposes that a pyramid facility be built at Rocky Flats, which would be the only structure remaining onsite. This pyramid would house a centralized storage facility, built in the center of the above ground pyramid-type structure. The structure would be built using granite blocks, and could possibly accommodate more then 963,000 cubic yards of low level, low level mixed waste, building rubble, soil residue, and transuranic waste if that is also left onsite in the event the WIPP facility does not open. Mr. Werth believes his proposed facility would have substantial cost savings for DOE, and help to solve the country's problems with storage and disposition of wastes. After his presentation, CAB members and others in the audience had a few comments and questions, such as whether the waste will be containerized, if any studies have been done on the feasibility of using granite to contain radioactive waste, as well as concerns about the budget numbers used. Other individuals may submit questions and comments to Mr. Werth in writing.

Slide Show Presentation / Discussion. Erin Rogers gave a presentation of the CAB slide show, which has been in development over the past year. The Board has had opportunity to review and revise the script of the slide show during the past few months. Board members were given comment forms and were asked to write down their thoughts and comments on the slide show as it was presented. The comment forms were collected at the end of the presentation, and Erin then went over with the Board any specific comments. A few changes were recommended; Erin will make those along with any relevant comments from the forms collected as a final slide show script. The Board approved the slide show, with those changes incorporated. Next step will be to offer CAB presentations at schools and local civic or community organizations. Board members will be asked to participate in giving those presentations as part of CAB's Speaker's Bureau.

CAB Vision Development Update / Discussion. Staff members reviewed for the Board the status of preparations for the remainder of CAB's Vision discussion. First, an outline was prepared of what the Vision report could conceivably look like, including: an executive summary of recommendations; background information on the site and the Board itself; CAB's core values related to cleanup and closure; and specific recommendations on items identified in the Board's work plan such as waste management, environmental restoration, D&D, shipment of special nuclear materials, and reuse/stewardship. The Board will focus its

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- Page 25 Groundwater Monitoring indicates that the treatment system influent will be monitored monthly for the first year; effluent will be monitored monthly for the first 6 months and then quarterly thereafter; and the downgradient water quality monitored quarterly. We would recommend that the influent and effluent be measured bi-monthly for the first six months to determine the efficiency of VOC removal by the system. If it is found to be operating properly monitoring should be performed monthly for the next two years to determine that the system is operating properly over a longer time period. We request that the city be provided with copies of analytical and monitoring reports already gathered for this system.

- Page 20, section 4.3, "Water Quality" notes that "The system will treat contaminated groundwater and discharge clean water to the aquifer via an infiltration gallery or discharge water directly to South Walnut Creek." Because of the City's concern for water quality in Walnut Creek, we request that that the City be notified and consulted prior to any decision being made for direct discharge to South Walnut Creek

- The Mound site has had a passive treatment system in place for removal of VOC's for more than a year. Please provide us with a copy of the laboratory analysis data report showing the percent removal of VOC contamination by this system, the flow rate through the system and other pertinent information.

The site notes that East Trench remediation system will be in place for many years after site closure. Since the selection of this remedy will necessitate an institutional control, we recommend that the site provide a cost benefit analysis of the various options. Although passive remediation has a low upfront cost, there could be a long-term maintenance and monitoring function that would require funding for a long period of time. Who would provide the long term monitoring and maintenance and funding for such activities?

Thank you for the opportunity to provide these comments.

Sincerely,

Mary Harlow

Mary Harlow, Rocky Flats Coordinator
City of Westminster

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